

**EXHIBIT 18**

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the New York Post

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
SANDRA GUZMAN,	:
	:
Plaintiff,	:
	:
v.	:
	:
NEWS CORPORATION, NYP HOLDINGS,	:
INC., d/b/a THE NEW YORK POST, and COL	:
ALLAN, in his official and individual capacities,	:
	:
	:
Defendants.	:
-----X	

Civil Action No.

09-CV-9323 (BSJ)

**DEFENDANT NYP HOLDINGS, INC., d/b/a THE NEW YORK POST'S OBJECTIONS  
AND RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES  
(CONFIDENTIAL RESPONSES INCLUDED)**

Defendant NYP Holdings, Inc., d/b/a The New York Post ("NYP"), by its attorneys  
Kasowitz, Benson, Torres & Friedman LLP, hereby objects and responds to Plaintiff Sandra  
Guzman's ("Plaintiff") First Set of Interrogatories to Defendants News Corporation and NYP  
Holdings, Inc., d/b/a The New York Post (hereinafter, the "Interrogatories").

**Interrogatory No. 9:** Identify the “more than 17 editors who were/are Asian, Hispanic and/or African-American, many of whom were still employed by the Post at the time of [Plaintiff’s] layoff in September 2009” as referenced on page 8 of the Position Statement filed with the EEOC.

**Objection and Response:** Defendant objects to Interrogatory No. 9 on the grounds that it is vague and ambiguous, overly broad, unduly burdensome and not reasonably limited in scope or time. Defendant further objects to this Interrogatory on the grounds that it seeks information which contains confidential and/or personal information concerning current and/or former employees. Defendant further objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the subject matter of this litigation, nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the General Objections and foregoing specific objections, Defendant states that some of the editors who were/are Asian, Hispanic and/or African-American include Ricky Eng, Andrew Wang, Robert George, Laura Egodigwe, Everett Sherman, Ralph Wimbish, Evelyn Cordon, Darryl Harrison, Juan Rodriguez, Juan Arellano, David Rentas, Carlos Ortiz, Javier Orellana, Sandra Guzman, Luiz Ribeiro, Alex Park, Cherise Bathersfield and Michelle Yoo.

This Response is designated as Confidential pursuant to the terms of the parties’ Stipulation and Order for Production and Exchange of Confidential Materials.

**Interrogatory No. 10:** Identify each and every person referenced in the statement that “the Post has a Human Resources department staffed with nine professionals” on page 4 of the Position Statement filed with the EEOC.

**Objection and Response:** Defendant objects to Interrogatory No. 10 on the grounds that it seeks information which contains confidential and/or personal information concerning current and/or former employees. Defendant further objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the subject matter of this litigation, nor reasonably